

Lon A. Jenkins (4060)
Tami Gadd (12517)
MaryAnn Bride (13146)
Katherine T. Kang (14457)
OFFICE OF THE CHAPTER 13 TRUSTEE
465 South 400 East, Suite 200
Salt Lake City, Utah 84111
Telephone: (801) 596-2884
Facsimile: (801) 596-2898
Email: utahtrusteemail@ch13ut.org

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

IN RE:

CASE: 25-20119

Patricia Rosalie Page

CHAPTER 13

Debtor

Hon. PEGGY HUNT

Confirmation Hearing: 3/25/25 10:30 am

**TRUSTEE'S OBJECTION TO CONFIRMATION AND RECOMMENDATION OF
DISMISSAL UNDER 1307(c) IF UNABLE TO RESOLVE**

Lon A. Jenkins, Chapter 13 Trustee, hereby objects to confirmation of the Debtor's plan and in support thereof represents as follows:

1. The Debtor filed a Chapter 13 petition for relief on January 09, 2025 and the First Meeting of Creditors under section 341 was held on February 14, 2025.
2. The Trustee requests that the Debtor provide a statement and evidence regarding the disposition of the \$81,580.77 from the sale of the home listed on the Debtor's Statements of Financial Affairs, Interrogatory No. 18. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

3. The Trustee requests a breakdown of what living expenses were paid with the \$5,650.00 withdrawn from the Debtor's America First Credit Union financial account in November 2024. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

4. The Trustee requests an explanation regarding the \$2,500.00 withdrawal from the America First Credit Union financial account on 12/9/2024. The Trustee reserves the right to raise any objections under the best-interest-of-creditors test of § 1325(a)(4) once these documents are received.

WHEREFORE, the Trustee objects to confirmation of the Debtor's plan. If the Debtor is unable to resolve the objection by the confirmation hearing, the Trustee will move to dismiss or convert the case.

Dated: February 25, 2025

MaryAnn Bride
Attorney for Chapter 13 Trustee

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Objection to Confirmation was served on the following parties on February 26, 2025:

Patricia Rosalie Page, 6389 W Lake Ave, South Jordan, UT 84009

ANDREW T. CURTIS, ECF Notification

/s/ Chelsea Anderson